IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

KAREN NASH, M.D.,)	
Plai	ntiff,)	
)	No. 08 C 3648
V.)	Judge Zagel
COUNTY OF COOK		į	Judge Zagei
Def	endant.)	

NOTICE OF FILING

TO: <u>ELECTRONIC FILING AND U.S. MAIL</u>

Linda C. Chatman Marcus, Boxerman & Chatman 19 S. LaSalle St. Suite 1500 Chicago, IL 60603

PLEASE TAKE NOTICE that on this July 1, 2008, the undersigned attorney electronically filed <u>Defendant's Motion for Enlargement of Time</u> with the Clerk of the United States District Court, for the Northern District of Illinois, Eastern Division using the CM/ECF filing system. Courtesy copies delivered to chambers at the time of filing.

RICHARD A. DEVINE State's Attorney of Cook County

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IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

KAREN NASH, M.D.,)
Plaintiff,)
V.) No. 08 CV 3648
) Judge Zagel
COUNTY OF COOK,) Magistrate Mason
Defendant.)

DEFENDANT'S AGREED MOTION FOR AN ENLARGEMENT OF TIME

NOW COME the Defendants, County of Cook, Cook County Bureau of Health Services by their attorney, RICHARD A. DEVINE, State's Attorney of Cook County, through his assistant, JAMIESON B. BOWMAN, Assistant State's Attorney, and hereby move this Honorable Court, pursuant to Federal Rule of Civil Procedure 6(b), for an enlargement of time in which to answer or otherwise plead to Plaintiff's Complaint and, in support of this motion, state as follows:

- The Defendants were served with a summons and complaint in this case on approximately June 27, 2008.
- To date, Defendants have begun to diligently preparing their answer, however, due to other litigation responsibilities Defendants require an extension of time in which to complete and file their answer.
- 3. This Motion is not made for dilatory reasons, rather it is a request for additional time made in good faith to enable the undersigned attorney to meet all obligations in a reasonable and orderly manner and will allow him to complete a well developed answer.
- 4. Defendants therefore request an extension, until August 1, 2008, within which to

file their Answer to the Complaint.

- Defendants' counsel sought and obtained Plaintiff's counsel's agreement to the
 Defendants' extension request.
- 6. This is Defendants' first request for an enlargement of time.
- 7. The request for an extension is made in good faith and will not prejudice the parties in this matter.

WHEREFORE, Defendants respectfully request that this Honorable Court enlarge the time in which Defendants must answer or otherwise plead an additional 15 days, or until August 1, 2008.

Respectfully submitted,

RICHARD A. DEVINE State's Attorney of Cook County

BY:

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